

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

LAURA SENNETT

Plaintiff

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Civil Action No. 1:09-cv-1063 (TSE/IDD)

MOTION TO DISMISS AMENDED COMPLAINT BY DEFENDANTS
PRINCE WILLIAM COUNTY AND
PRINCE WILLIAM COUNTY POLICE DEPARTMENT

COMES NOW THE DEFENDANT, PRINCE WILLIAM COUNTY (and, to the extent it is sued, the PRINCE WILLIAM COUNTY POLICE DEPARTMENT), by counsel, in response to plaintiff Laura Sennett's Amended Complaint, and pursuant to Federal Rule of Civil Procedure 12(b)(6), submits its Motion to Dismiss Counts II, III and IV of the Amended Complaint for failure to state a claim for which relief may be granted, as further set forth in its Memorandum of Points and Authorities, also submitted this day.

WHEREFORE, defendant Prince William County (and, to the extent it is sued, Prince William County Police Department) prays that this Honorable Court grant its Motion to Dismiss; dismiss plaintiff's Amended Complaint with prejudice; grant the defendants' attorneys' fees and costs; and for such other and further relief as is just and proper.

Respectfully submitted,

PRINCE WILLIAM COUNTY and
PRINCE WILLIAM COUNTY POLICE
DEPARTMENT
By Counsel

ANGELA L. HORAN
County Attorney

_____/s/
M. Alice Rowan, VSB #27056
Assistant County Attorney
Attorneys for Defendant Prince William County and
Prince William County Police Department
One County Complex Court
Prince William, VA 22192-9201
Phone: (703) 792-6630
Fax: (703) 792-6633
Email: arowan@pwcgov.org

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 1 day of February, 2010, I will electronically file the foregoing Motion to Dismiss Amended Complaint with the Clerk of the Court using the CM/ECF system. Service of the Notice will be made electronically upon counsel with indicated email address this date upon the following, and by U.S. mail, first-class postage pre-paid, to those without indicated email address, as follows:

Thomas M. Wolf, Esquire, VSB #18234
LeClair Ryan
951 East Byrd Street, 8th Floor
Richmond, Virginia 23219
Telephone: (703) 783-2003
Facsimile: (703) 783-2294
Email: Thomas.Wolf@leclairryan.com
Attorneys for Plaintiff Laura Sennett

Sarah E. Moffett, Esquire, VSB 72208
LeClairRyan
225 Reinekers Lane, Suite 700
Alexandria, Virginia 22314
Telephone: (703) 647-5930
Facsimile: (703) 647-5980
Email: Sarah.moffett@leclairryan.com
Attorneys for Plaintiff Laura Sennett

R. Joseph Sher, Esquire
Assistant United States Attorney
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3747
Facsimile: (703) 299-3983
Email: joe.sher@usdoj.gov
Counsel for Detective Vincent Antignano

Ara Tramblian, Esquire
Deputy County Attorney
Office of the County Attorney, Arlington
2100 Clarendon Boulevard, Suite 403
Arlington, VA 22201
Telephone: (703) 228-3100
Telefacsimile: (703) 228-7106
Email: atramblan@arlingtonva.us
Attorneys for Defendants County of Arlington and Detective Jason K. Bryk

The Honorable Eric Holder, Attorney General
U.S. Department of Justice
Office of the Attorney General
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001
Attorneys for Defendants U.S. Department of Justice
And Federal Bureau of Investigation Joint Terrorism Task Force

Angela L. Horan
County Attorney

/s/

M. Alice Rowan, VSB #27056
Assistant County Attorney
One County Complex Court
Prince William, VA 22192-9201
Phone: (703) 792-6630
Fax: (703) 792-6633
Email: arowan@pwcgov.org
Attorneys for Defendants
Prince William County and
Prince William County Police
Department